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7

8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2010-86**

12 **LIHUA WANG**
13 **aka LI HUA WANG**
14 **6415 Rosemead Blvd., Apt. 23**
15 **San Gabriel, CA 91775**

A C C U S A T I O N

16 **Registered Nurse License No. 713627**

17
18 Respondent.

19 Complainant alleges:

PARTIES

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation
21 solely in her official capacity as the Interim Executive Officer of the Board of Registered
22 Nursing ("Board"), Department of Consumer Affairs.

23 2. On or about October 9, 2007, the Board issued Registered Nurse License
24 No. 713627 to Lihua Wang, aka Li Hua Wang ("Respondent"). The Registered Nurse License
25 was in full force and effect at all times relevant to the charges brought herein and will expire on
26 June 30, 2011, unless renewed.

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1 PRAYER


2 WHEREFORE, Complainant requests that a hearing be held on the matters herein
3 alleged, and that following the hearing, the Board issue a decision:

4 1. Revoking or suspending Registered Nurse License No. 713627, issued to
5 Lihua Wang, aka Li Hua Wang.

6 2. Ordering Lihua Wang, aka Li Hua Wang, to pay the Board the reasonable
7 costs of the investigation and enforcement of this case, pursuant to Business and Professions
8 Code section 125.3.

9 3. Taking such other and further action as deemed necessary and proper.

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11 DATED: 8/18/2009

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14 LOUISE R. BAILEY, M.ED., RN
15 Interim Executive Officer
16 Board of Registered Nursing
17 State of California
18 Complainant

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DOJ Matter ID: LA2009603352
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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Interim Suspension Order
11 Against:

Case No. *2010-86*

12 **LIHUA WANG**
13 **6415 N. Rosemead Blvd., Apt. 23**
San Gabriel, CA 91775

**STIPULATED INTERIM
SUSPENSION OF LICENSE**

14 **Registered Nurse License No. 713627**

15 Respondent.
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17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 **PARTIES**

20 1. Heidi J. Goodman ("Complainant") is the Assistant Executive Officer of the Board of
21 Registered Nursing. She brought this action solely in her official capacity and is represented in
22 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Alvaro
23 Mejia, Deputy Attorney General.

24 2. Lihua Wang, aka Li Hua Wang ("Respondent") is represented in this proceeding by
25 attorney Evan Phillip Freed, Esq., whose address is 817 Torrance Blvd, Suite 302,
26 Redondo Beach, CA 90277.

27 3. On or about October 9, 2007, the Board of Registered Nursing issued Registered
28 Nurse License No. 713627 to Lihua Wang. The license was in full force and effect at all times

1 relevant to the charges brought forth in the Petition for Interim Suspension Order and will expire
2 on June 30, 2011, unless renewed.

3 **JURISDICTION**

4 4. The Petition for Interim Suspension Order against Lihua Wang ("Petition"), was filed
5 before the Board, and is currently pending against Respondent.

6 **ADVISEMENT AND WAIVERS**

7 5. Respondent has carefully read, and understands the charges and allegations in the
8 Petition. Respondent has also carefully read, and understands the effects of this Stipulated
9 Interim Suspension of License.

10 6. Respondent is fully aware of her legal rights in this matter, including the right to a
11 hearing on the charges and allegations in the Petition; the right to be represented by counsel at her
12 own expense; the right to present affidavits, documentary evidence and oral argument at the
13 hearing; and all other rights accorded by the California Administrative Procedure Act and other
14 applicable laws.

15 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
16 every right set forth above.

17 **STIPULATION**

18 IT IS HEREBY STIPULATED that Registered Nurse License Number 713627 issued to
19 Lihua Wang, is temporarily suspended pending resolution of the administrative proceedings.

20 1. Respondent shall lose all rights and privileges as a registered nurse in California as of
21 the date of this fully executed Stipulated Interim Suspension of License until the resolution of an
22 Accusation to be filed before the Board against Respondent's license;

23 2. Respondent shall not be practice or attempt to practice any aspect of nursing in the
24 State of California until the Board's decision following an administrative hearing becomes final;

25 3. Respondent shall not advertise, by any means, or hold herself out as practicing or available
26 to practice nursing.

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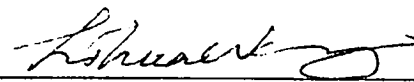
1 4. Respondent shall, within 48 hours of executing this Stipulated Interim Suspension of
2 License, deliver to the Board, or its agent, for safekeeping pending a final administrative order of
3 the Board in this matter, all indicia of her licensure as a registered nurse, including, but not
4 limited to, her wall certificate and wallet card issued by the Board.

5 5. The parties understand and agree that facsimile copies of this Stipulated Interim
6 Suspension of License, including facsimile signatures thereto, shall have the same force and
7 effect as the originals.

8 **IT IS SO STIPULATED**

9 I have carefully read the Stipulated Interim Suspension of License. I understand the
10 stipulation and the effect it will have on my Registered Nursing License. I enter into this
11 voluntarily, knowingly, and intelligently, and agree to be bound by the conditions in this
12 agreement.


13 DATED: 7/29/09



LIHUA WANG
Respondent

15 I have read and fully discussed with Respondent Lihua Wang the terms and conditions and
16 other matters contained in this Stipulated Interim Suspension of License. I approve its form and
17 content.

18 DATED: 7/29/09

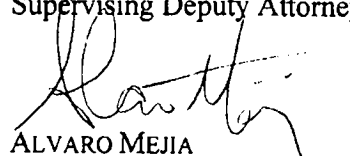


EVAN PHILLIP FREED, ESQ.
Attorney for Respondent

20 **IT IS SO STIPULATED**

21 DATED: 8/4/2009

23 EDMUND G. BROWN JR.
24 Attorney General of California
25 GREGORY J. SALUTE
26 Supervising Deputy Attorney General



ALVARO MEJIA
Deputy Attorney General
Attorneys for Complainant